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**From:** Cheever, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F12D4E8C3C5B4E879445B927ED54814A-CHEEVER, ROBERT]  
**Sent:** 1/17/2018 8:11:51 PM  
**To:** Ashley Eichman [KDHE] [Ashley.Eichman@ks.gov]  
**Subject:** RE: NSPS Relocation Question

Ashley,

Our answer is based on the date of tank original construction is before the effective date of OOOOa.

R. L. (Bob) Cheever  
Environmental Engineer  
Air Permitting and Compliance Branch  
Air & Waste Management Division  
U.S. EPA, Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

913-551-7980  
cheever.robert@epa.gov

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**From:** Ashley Eichman [KDHE] [mailto:Ashley.Eichman@ks.gov]  
**Sent:** Tuesday, January 16, 2018 11:23 AM  
**To:** Cheever, Robert <cheever.robert@epa.gov>  
**Subject:** RE: NSPS Relocation Question

Hi Bob,

Is it okay if I forward this response onto the facility?

Thanks,

Ashley Eichman

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**From:** Cheever, Robert [mailto:cheever.robert@epa.gov]  
**Sent:** Tuesday, January 16, 2018 11:11 AM  
**To:** Ashley Eichman [KDHE] <Ashley.Eichman@ks.gov>  
**Cc:** Burns, Ward <Burns.Ward@epa.gov>  
**Subject:** RE: NSPS Relocation Question

Ashley,

I have finally after much coaxing received an answer for your question.....I think...

The GP table to OOOOa (Table 3) says 60.14 applies unless OOOOa says something different – for storage there is nothing different for modification, so GP prevails on this one – see 60.14(e)(6).

That said, the 60.14(e) are “alone” changes, which means that if all they do is move it, it doesn’t trigger modification. Any other changes which might trigger modification or reconstruction would have to be evaluated.

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**From:** Burns, Ward  
**Sent:** Monday, December 18, 2017 11:39 AM  
**To:** Cheever, Robert <[cheever.robert@epa.gov](mailto:cheever.robert@epa.gov)>  
**Subject:** FW: NSPS Relocation Question

Bob,

Can you help Ashley with this question.

Thanks,  
Ward  
X7960

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**From:** Ashley Eichman [KDHE] [<mailto:Ashley.Eichman@ks.gov>]  
**Sent:** Monday, December 18, 2017 8:53 AM  
**To:** Burns, Ward <[Burns.Ward@epa.gov](mailto:Burns.Ward@epa.gov)>  
**Subject:** NSPS Relocation Question

Hi Ward,

I have a facility that is looking to relocate two fiberglass oil/condensate tanks and an oil/water separate from an abandoned facility to another permitted compressor station. I'm trying to determine if this relocation will trigger requirements under NSPS OOOOa. I've reviewed both the regulation and the ADI. There were several determinations in the ADI for other NSPS regulations that said relocation does not trigger construction, reconstruction, or modification. However, I wanted to confirm this would apply to NSPS OOOOa as well before responding to the facility. Any assistance would be appreciated.

Thanks,

Ashley Eichman  
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Air Permitting Section  
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